



**PRE CONSTRUCTION SERVICES, INC.**

2512 W. INTERSTATE 44 SERVICE ROAD-OKLAHOMA CITY, OK 73112  
VOICE: 405.722.5800 FAX: 405.602.3863 [www.preconstructionservices.com](http://www.preconstructionservices.com)

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## Initial Cost Report

August 23, 2018

Mr. R. Greg Andrews  
Robinson Renaissance, 11th Floor  
119 N. Robinson  
Oklahoma City, OK 73106

Re: Smith Residence – 314 8th Street– Cushing, OK

Dear Mr. Andrews,

On April 20, 2018, I made a site visit along with yourself, we met and made a walk-through to tour the issues to the Smith Residence in Cushing, Oklahoma. Also present was Mr. Steve Ford. PE, PHD, representing ZFI Engineering, Inc. and the opposing Attorney, Mr. Adam Engel of Mansell, Engel and Cole Law Firm, to observe and take photographs of the damage issues. During the site visit, I made observations and familiarized myself with the site.

### Site Observations:

During my site visit, I took 67 photos (photos can be supplied upon request). I started my observations with the direction of Mr. Ford of ZFI Inc. Mr. Ford had difficulties distinguishing between an aged structure, deferred maintenance and possible earthquake damage. It was difficult to see and plaster cracking in the walls, since the walls were encapsulated with plywood paneling. Most of the ceilings were encapsulated with acoustical tile, making it difficult as well, to observe any ceiling plaster cracking.

The carpet was pulled back, to observe the cracking in the northeast bedroom concrete floor. Steve Ford recommended digging from the outside, for the depth of the footing. Both of us excavated in two locations: 1) The north wall of the Northeast bedroom



addition and 2) The east wall of the living room. The bedroom appeared to have no foundation footing, and the living room foundation consisted of masonry stone rubble, approximately 10" below the wood plate. Mr. Ford looked into the attic through the kitchen ceiling access scuttle and under the house, through the master bedroom closet floor access.

Based on Mr. Ford's findings, the earthquake damage he could visibly observe, was four (4) to six (6) brick column supports, supporting the floor structure under the house, were partially dislodged. I observed 171 photos Mr. Ford supplied to me from our site visit on April 20<sup>th</sup>. Since Mr. Ford was the only person from our site visit who crawled under the house, I reviewed the photos he produced showing the dislodged brick pilasters.

### **Estimate Methodology:**

Before attending the site visit, I reviewed the Rimkus Consulting Group Inc. – Ms. Lisa M. Holliday, PE, PHD Report, to familiarize myself with the background of issues of the structural failures. On page 3 of her Report, Ms. Holliday mentioned that the Smith's stated "the front door would not close, and they replaced it." Other than the door, I could not find any other items from her report for me to estimate.

Mr. Ford relayed to me the issues with the brick pilasters under the house. I discussed with Mr. Ford, the difficulties of accessing to repair the brick pilasters. Mr. Ford suggested I need to estimate the cost of accessing the floor by pulling back the carpet and cutting two holes in the wood floor system either side of the north/south running floor beam, for personnel access, materials and equipment. These access points would most likely be in the living room and one of the bedrooms.

Once the access is made, it would be necessary to shore the structure and then remove and clean the bricks for proper replacement with new mortar. The estimate also includes the subfloor repair, the patching of hardwood flooring and staining finish. The carpet would be relayed as well.

It is my understanding that the goal is to perform the repairs as quickly as possible to minimize the Smith's interruption.

### **Documents supplied to my firm were the following:**

ZFI findings as described above

Rimkus Consulting Group, Inc. Report of Findings– dated 09.18.2017

### **Additional work not included in the cost estimate:**

- 1) Costs for Rentals, Lodging during the repairs for the Smith Residences
- 2) Costs for removal, storage, and replacement of loose furnishings.

### **Opinions:**

The Cost Estimate provided with this Report is based on conclusions of the ZFI findings and opinion of repairs along with my own visual observations and experience.

### **Facts and Data:**

The unit Costs are based on: Gordian - R.S. Means 2018 Residential Cost Data 37<sup>th</sup> annual edition.

### **Conclusion:**

This is my "Initial Cost Report," and I reserve the right to further clarify/modify my estimate after review of any further analysis or any other supplemental reports, depositions or other engineering information, if provided, relating to this case after the date of this Cost Report.

### **Repair Estimate, as described above:**

Estimate.....\$8,523  
Total:.....\$8,523

(See attached for breakdown.)

### **QUALIFICATIONS + AFFILIATIONS**

B.S. DEGREE ENGINEERING TECHNOLOGY-OKLAHOMA STATE UNIVERSITY 1976  
A.S. DEGREE CONSTRUCTION MANAGEMENT TECHNOLOGY-OKLAHOMA STATE UNIVERSITY 1976  
MECHANICAL & ELECTRICAL ESTIMATING – R.S. MEANS CERTIFIED 2000  
FACILITIES ESTIMATING SEMINAR –R.S. MEANS 2000  
DESIGN AND CONSTRUCTION COMMITTEE-OKLAHOMA CITY MEMORIAL 1995-1998  
AMERICAN SOCIETY OF PROFESSIONAL ESTIMATORS-CPE CERTIFIED 2005  
CHARTER MEMBER ASPE OKLAHOMA CITY-LANDRUN CHAPTER 80  
ASPE-OKLAHOMA CITY-LANDRUN CHAPTER 80 – PRESIDENT 2008-2011,  
ASPE-OKLAHOMA CITY-LANDRUN CHAPTER 80 – MEMEBERSHIP-CHAIR 2013-PRESENT  
ASPE-NATIONAL INDUSTRY AWARENESS COMMITTEE-CHAIR 2011-2013  
ASPE-NATIONAL MEMBERSHIP COMMITTEE-CHAIR 2013-2014  
ASPE-NATIONAL AWARDS COMMITTEE-CHAIR 2014-2017  
ASPE-NATIONAL CERTIFICATION COMMITTEE-CHAIR 2018-PRESENT  
BILL GLASS CHAMPIONS FOR LIFE-PRISION MINISTRY TEAMATE  
CENTRAL OKLAHOMA – AIA AFFILIATE MEMBERSHIP 2000-PRESENT  
CERT-CONSULTING ESTIMATORS ROUNDTABLE 2015-PRESENT -  
CERT-CONSULTING ESTIMATORS ROUNDTABLE - NATIONAL PRESIDENT 2018-PRESENT

**List of Publications authored by Witness:**

EXPERT WITNESS: QUESTIONS TO ANSWER BEFOREHAND  
MAY/JUNE 2018 "DCD MAGAZINE" PAGE 56

PARALLEL ESTIMATES AS A MONEY-SAVING PRACTICE  
NOV./DEC. 2016 "DCD MAGAZINE" PAGE 10

BIM UPDATE-NATIONAL INSTITUTE OF BUILDING SCIENCES CONVENTION  
APRIL 2013 "ESTIMATING TODAY" PAGE 21

THE "BUZZWORDS" of BIM  
APRIL 2012 "ESTIMATING TODAY" PAGE 23

CERTIFIED BIM ESTIMATORS?  
MARCH 2013 "ESTIMATING TODAY" PAGE 6

MEMBER PROFILE-NATIONAL INDUSTRY AWARENESS COMMITTEE CHAIR – SOUTHWEST  
REPRESENTATIVE  
DECEMBER 2011 "ESTIMATING TODAY" PAGE 6

INDUSTRY AWARENESS – ESTIMATING & BIM  
OCTOBER 2011 "ESTIMATING TODAY" PAGE 9

**LITIGATION COSTING PAST 4 YEARS:**

ROSS WEAVER &  
ALEXANDRA STANKUS VS,  
S and D HOMES  
YUKON, OK  
**DEPOSITION/SETTLED**

2018  
FOUNDATIONS AND  
WEEP HOLE ISSUES

FOSHEE & YAFFE  
OKLAHOMA CITY, OK

BEST WESTERN PLUS  
508 EAST MAIN ST.  
CUSHING, OK

2017  
FOUNDATION ISSUES

MARVIN LAWS, P.C.  
MUSTANG, OK

BIRD RESIDENCE  
700 CABELLA COURT  
NORMAN, OK  
**DEPOSITION  
SETTLED**

2016  
WATER ISSUES

CARTCART DOOLEY  
OKLAHOMA CITY, OK

TIMBERLAKE CONSTRUCTION vs  
NN PROPERTIES  
CJ-2015-1312  
OKLAHOMA COUNTY  
**DEPOSITION**

2016  
PUNCHLIST ISSUES

DENTON LAW FIRM  
MUSTANG, OK

WMATA-TRANSIT CENTER  
SILVER SPRING, MARYLAND  
**DEPOSITION  
SETTLED**

2016  
LIFE CYCLE COSTS

AKIN, GUMP, STRAUSS  
HAUER & FELD LLP

4900 CORONADO BRIDGE COURT FOUNDATION FAILURE EDMOND, OK <b>SETTLED</b>	2016 FOUNDATION ISSUES	HARRISON & MECKLENBERG LAW FIRM – KINGFISHER, OK
REPLACE WALKER RES. TUTTLE, OK	2016 TORNADO DAMAGE	GIVENS LAW FIRM OKLAHOMA CITY
STRATFORD v. FOOTLOCKER 7307 NORTH MacARTHUR OKLAHOMA CITY <b>SETTLED</b>	2016 BUILDING REPLACE	McAFEE & TAFT, P.C. OKLAHOMA CITY, OK
HAYS VS. FARMERS CLINTON, OK	2016 REVIEW ESTIMATE	FRAILEY, CHAFFIN, CORDELL PERRYMAN & STERKEL CHICKASHA, OK
FRANK LOVE RESIDENCE NICHOLS HILLS, OK <b>SETTLED</b>	2015 FIRE ESTIMATE INS. REVIEW	LOVE'S STORES
ROSSCO V. CHECOTAH CHECOTAH HIGH SCHOOL CHECOTAH, OK. <b>DEPOSITION/SETTLED</b>	2014 ESTIMATING EXCAVATION	STEIDLEY & NEAL TULSA, OK
WALLING RESIDENCE 3808 MANNING RD. EL RENO, OK <b>1-DEPOSITION</b>	2014 ESTIMATING TORNADO DAMAGE	HELMS & GREENE, LLC OKLAHOMA CITY, OK
WOMBLE RESIDENCE 1817 GUILFORD LANE NICHOLS HILLS, OK	2014 ESTIMATING WATER DAMAGE	HELMS & GREENE, LLC OKLAHOMA CITY, OK
GAINES vs TIMBERCRAFT HOMES EDMOND, OK <b>SETTLED</b>	2014 ESTIMATING	ANDREW KARIME OKLAHOMA CITY, OK
LECLEREC RESIDENCE 5715 HARPER CREEK TRAIL EDMOND, OK <b>2-DEPOSITIONS ARBITRATION WITNESS</b>	2014 ESTIMATING MASONRY/STUCCO/ DRYWALL/ROOFING ISSUES	WHEELER, WHEELER, MORGAN, FAULKNER & BROWN
WESTERN HEIGHTS VS KB CONSTRUCTION, INC. CASE NO. CJ-2011-7230 OKLAHOMA COUNTY <b>SETTLED</b>	2014 ESTIMATING ROOF REPAIR	BROWN & BROWN, PC OKLAHOMA CITY

Statement of Compensation in this case:

Estimating services, meetings, site visits and travel time: \$120 per hour

Depositions and Prep: \$140 per hour

Court Witness, Arbitration Witness and prep: \$150

*(rates are subject to change after one year of retainment)*

*(PCSI uses it's proprietary software and reserves the right to protect it's own interests. The Client will have no rights to the software itself, yet the work produced in protected format, may be provided on a limited basis)*

My opinions and conclusions as expressed in this report are based upon my education, training, work experience and general familiarity with supporting data in my areas of expertise, and the information provided to me by you, as well as my familiarity with the standards of practice of construction in the community. I have a Bachelor's of Science in Engineering Technology and Associate Degree in Construction Management Technology. I am a Certified Professional Estimator. Although my expertise is focused on estimating, I am often asked to give an opinion on scheduling, project phasing, constructability, site staging and market conditions as related to a particular project.

David Battle - FCPE, CERT



SMITH RESIDENCE - CUSHING OK

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**COST ESTIMATE SUMMARY**

**PROJECT:** SMITH RESIDENCE  
**LOCATION:** 314 EAST 8TH STREET CUSHING, OKLAHOMA  
**PREPARED FOR:** CUSHING HOSPITALITY, LLC  
**ESTIMATE #:** 18-026  
**ESTIMATOR:** Pre Construction Services, Inc.  
**DATE:** 8/22/2018

ESTIMATE TOTAL

\$ 8,523

SEE ATTACHED ESTIMATE - BREAKDOWN

TOTAL \$ 8,523

SMITH RESIDENCE 314 E. 8TH  
CUSHING, OKLAHOMA



# FORENSIC COST ANALYSIS

PROJECT: SMITH RESIDENCE EARTHQUAKE REPAIR  
DESCRIPTION: FORENSIC COST ESTIMATE  
LOCATION: 314 EAST 8TH ST. CUSHING, OK  
ESTIMATOR: PRE CONSTRUCTION SERVICES, INC.

FILE: 18-026  
DATE: 8/22/2018  
AREA SF: 1,439

## REPAIR ESTIMATE

### UNIT COSTING BASED ON

RS MEANS RESIDENTIAL COSTS 2018 37TH ANNUAL EDITION

DESCRIPTION	FLOOR AREA	COST FT SQ	RS MEANS CSI CODE NUMBERS	QTY	UNIT	MATERIAL COST	TOTAL COST	LABOR COST	EQUIPMENT COST	SUBCONTRACT COST	TOTAL COST	TOTAL
<b>1 DEMOLITION</b>	1,439 SF	0.83 PSF										
2 PULL BACK CARPET IN LIVING ROOM			0905 05.20 0480	421	SF	0.00	0	0.07	29	0.00	0	29.47
3 PULL BACK CARPET IN SW BEDROOM			0905 05.20 0480	179	SF	0.00	0	0.07	13	0.00	0	12.53
4 DEMO-SAWCUT FLOOR OPENINGS-LIVING ROOM			0241 19.16 7200	1	EA	0.00	0	112.74	113	22.14	22	134.88
5 DEMO-SAWCUT FLOOR OPENINGS-SW BEDROOM			0241 19.16 7200	1	EA	0.00	0	112.74	113	22.14	22	134.88
6 DEMO-STRIP FLOORING INTERIOR 2-1/4" X 25/32" THICK- LIVING ROOM			0905 05.20 3400	8	SF	0.00	0	3.42	27	0.00	0	27.36
7 DEMO-STRIP FLOORING INTERIOR 2-1/4" X 25/32" THICK- SW BEDROOM			0905 05.20 3400	8	SF	0.00	0	3.42	27	0.00	0	27.36
8 SHORING FLOOR BEAMS - SCREW JACKS AND PLATES			0154 23.70 2650	12	EA	3.87	46	26.53	318	0.00	0	364.80
9 SALVAGE BRICKS AT EACH FLOOR PEDISTAL			0405 05.10 2080	12	LF	0.00	0	35.41	425	0.00	0	424.92
10 REMOVE FRONT ENTRY DOOR			0805 05.10 0200	1	EA	0.00	0	17.71	18	0.00	0	17.71
11 REMOVE FRONT ENTRY DOOR FRAME			0805 05.10 2200	1	EA	0.00	0	23.21	23	0.00	0	23.21
<b>12 MASONRY</b>	1,439 SF	1.31 PSF										
13 16"X16" COLUMN SOLID			0421 13.18 0400	12	LF	0.00	0	143.25	1,719	0.00	0	1,719.00
14 REMOVE SHORING FLOOR BEAMS - SCREW JACKS AND PLATES			0154 23.70 2650	12	EA	0.00	0	13.26	159	0.00	0	159.12
<b>15 ROUGH CARPENTRY</b>	1,439 SF	0.06 PSF										
16 SUBFLOOR WITH BOARDS 1"X6" LAID REGULAR			0616 23.10 0452	16	SF	3.44	55	2.23	36	0.00	0	90.72
<b>17 DOORS</b>	1,439 SF	0.44 PSF										
18 NEW FRONT METAL DOOR INCL JAMB AND BRICKMOLD			0817 23.10 3550	1	EA	376.31	376	46.42	46	0.00	0	422.73
19 DOOR FINISH HARDWARE			0871 20.40 0400	1	EA	167.13	167	37.14	37	0.00	0	204.27
<b>20 FINISHES</b>	1,439 SF	0.61 PSF										
21 PATCH OAK 25/32"X2-1/4". NOT FINISHED			0964 29.10 4900	16	SF	7.12	114	6.53	104	0.00	0	218.40
22 FINISH WOOD FLOORS			0981 23.52 3400	16	SF	0.60	10	1.33	21	0.00	0	30.88
23 PAINT FRONT DOOR AND FRAME			0981 13.70 0370	1	EA	16.99	17	124.68	125	0.00	0	141.67
24 RE-LAY CARPET			0968 16.10 0701	600	SF	0.00	0	0.80	480	0.00	0	480.00
<b>25 SUB TOTALS:</b>							785		44		0	4,664
26 GENERAL CONDITIONS		20.00%										933
27 CONTRACTOR OVERHEAD/PROFIT & INSURANCE		27.00%										1,511
28 RESTORATION CONTINGENCY		10.00%										711
29 ARCHITECTURAL & ENGINEERING FEES		9.00%										704
<b>30 TOTAL:</b>												<b>8,523.00</b>

8/22/2018

PRE CONSTRUCTION SERVICES, INC.